

E-IR

APRIL 1990

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

Name of Facility: AMP Incorporated
Address: 1175 N. Main St.
Harrisonburg, VA 22801
EPA ID Number: VAD09844474
Facility Representative: John Rehm
Title: Plant Manager
Telephone Number: (703) 433-3200
Inspector's Name: Cheryl Finley
Title: Environmental Engineer Sr
Date of Inspection: November 28, 1990

10-22

Sheila
Thanks
Dave

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.) metal plating, assembly of electronic components, ink stamping

2. Give a brief description of the waste stream(s) and hazardous waste code(s) generated by the firm.

Gold filters - F007 Denatured Ethyl Alcohol - F003 Tetrachloroethylene - F001
Waste water treatment sludge F006 (not called F007) ^{Methyl Acetate} Trichloroethylene - F001
Lead-Tin filters - D008 (not called F007) ^{Fluorocarbon} caustic clean (D002) Lead-Tin bath - D008/F007
Petroleum Naphtha - D001 Trichloroethylene - F001 Electroplating rinswaters (F007)
Gold/Cyanide Bath - F007 Gold stripper - F007 formaldehyde - U122 lab packs - D005/U024 F007
D008/P115
D009

3. List the amounts of hazardous waste generated on a monthly basis (use the highest monthly total) and the greatest amount accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	max Amount Accumulated
F007 (Au filters)	140 lb/mo	2062 lb
F006	3,291 lb/mo	12,356 lb
D008	140 lb/mo	773 lb
D001	200 gal/mo	200 gal
F001 (1,1,1 trichloroethylene)	338 lb/mo	2,364 lb
F001 (treon)	492 lb/mo	1,000 lb
D002 (caustic)	240 gal/mo	0 - to WWT
max. sum (1)	60 gal/mo	0 - to WWT

waste
Lead/Tin or
Gold/Cyanide bath
generated

Code
0122
FO06 (sweepings)

Amt. Generated
55 gal/mo
450 lb/mo

Amt. Accumulated
55 gal
450 lb

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or ☒ YES ☐ NO
F020-F023 and F026-F027)? 20 lb P115 - use unknown lab pack

100 kg of clean-up from a spill of P listed waste YES ☐ YES ☒ NO
or F020-F023 and F026-F027 waste?

If yes, then the facility is a generator.

5. How is the waste presently being handled? Where is it sent?

FO06 to WRL, FO07 to Leo Renal, Vanguard, or ACR, DO08 to Chem-Clear,
or Clean Harbor - also a lab pack to GSX, DO01 to Marisol, GSX, Safety-Kleen
FO01 to Safety-Kleen, GSX, Marisol, DO05/DO24, DO08/P115, DO09 to GSX

6. Does the facility generate any hazardous waste ☐ YES ☒ NO
that is excluded from regulation? If yes, list the
waste and the basis for exclusion. _____

7. Does the facility generate any hazardous waste ☐ YES ☒ NO
that is burned for energy recovery (hazardous waste
fuel)? If yes, list the waste, where it is sent, and
complete the Recyclable Materials Checklist.

Ethyl Alc. Eth Acetate - new process - not yet disposed of - burning has
been proposed - not yet done.

8. Does the facility generate any used oil that ☒ YES ☐ NO
is burned for energy recovery (used oil fuel),
including used oil that is also a characteristic
hazardous waste, or used oil that is mixed with
hazardous waste generated by a conditionally exempt
Small Quantity Generator? If yes, list the waste, where
it is sent, and complete the Recyclable Materials Checklist.

hydraulic oil to Safety-Kleen

9. Does the facility generate any hazardous waste ☒ YES ☐ NO that is reclaimed to recover economically feasible amounts of gold^{vanadium}, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? If yes, list the waste, where it is sent, and complete the Recyclable Materials Checklist.

sold filter - bath

10. Does the facility generate, transport or collect spent lead-acid batteries? If yes, complete the Recyclable Materials Checklist. YES ☒ NO

11. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- ☒ c. generator
- d. permitted or interim status TSD
- ☒ e. unpermitted TSD (explain in comments section)

[Circle One]

12. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate indefinitely, but if the amount accumulated ever exceeds 1000 kgs. then he becomes a small quantity generator. At the time the 1000 kg. limit is passed, the accumulation times for small quantity generators begins.

Small quantity generators can accumulate up to 180 days or 270 days if the disposal site is over 200 miles away. However, if at any time over 6000 kgs. of waste is accumulated, then the small quantity generator becomes a generator.

13. List each container and tank accumulation area. Specify the number and capacity of each tank. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that site.]

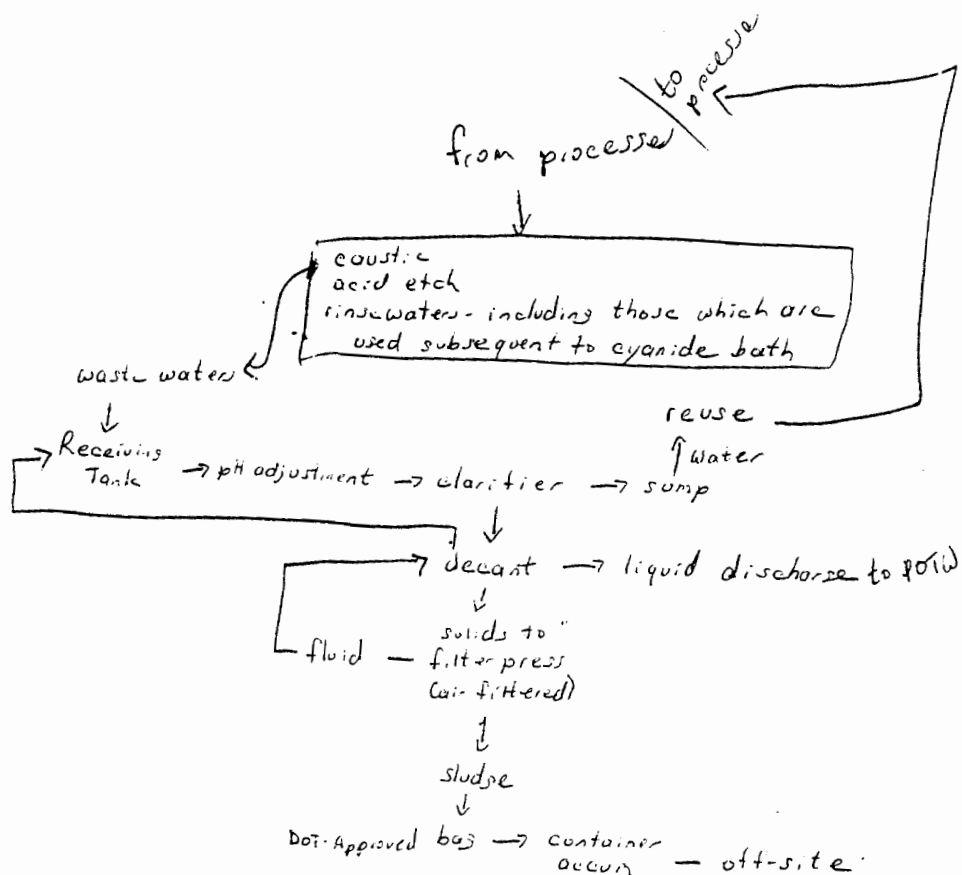
Location	Number of Containers	Number of Tanks	Capacity
filter storage (inside fence)	3	0	55 gal @
" (outside fence)	2	0	55 gal @
acid/raumat storage	2	0	55 gal @
floor liquids	7	0	55 gal @
WWT	5	0	1 ton @
caustic	5	0	55 gal @

14. Comments

Greater than 90-day storage confirmed by 1989 annual report; inspection loss, waste on-site during the inspection, inventory loss implied by manifests.

15. Flow Diagrams

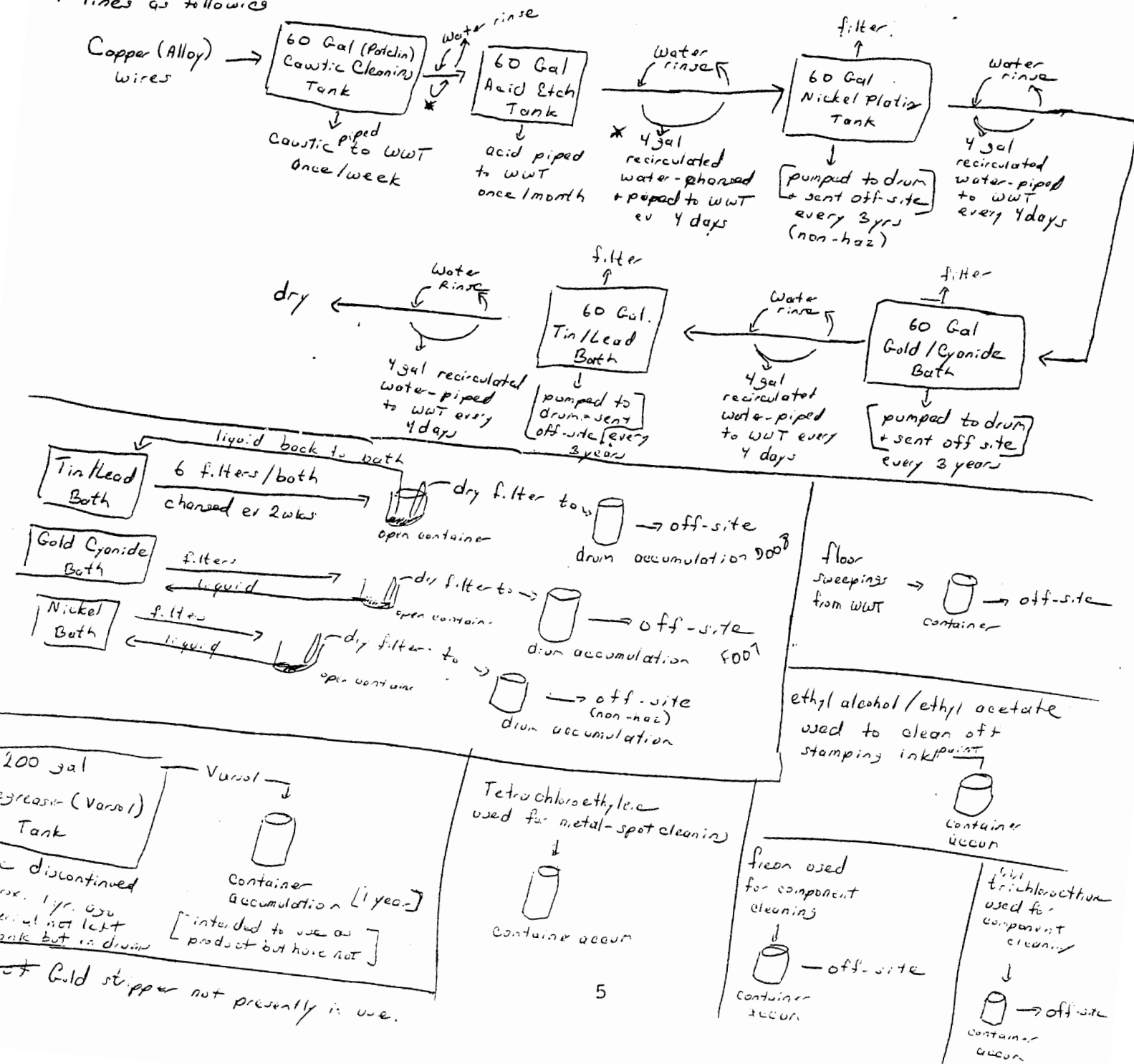
WWT



15. Waste Management Flow Diagram

(On this page sketch a brief, but detailed, flow diagram that includes where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

7 lines as follows



APRIL 1990

INSPECTION CHECKLIST FOR
THE USE AND MANAGEMENT OF CONTAINERS

Name of Facility: AMP Incorporated
Address: 1175 N. Main St.
Harrisonburg, VA 22801
EPA ID Number: VAD098444474
Facility Inspection Representative: John Rehm
Title: Plant Manager
Telephone Number: (703) 433-3200
Inspector's Name: Cheryl Finley
Title: Environmental Engineer Sr.
Date of Inspection: November 28, 1990

Va. Hazardous
Waste Reg.

9.8.B.

1. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?

YES NO

If no, list the storage/accumulation areas where there are problems and the type of problem:

<u>Location</u>	<u>Problem</u>
_____	_____
_____	_____
_____	_____
_____	_____

9.8.C.

2. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?

YES NO

6.4.E.b 3. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container? YES ☒ NO

6.4.E.c. 4. Is the container labeled or marked clearly with the words "Hazardous Waste"? ☒ YES NO

9.8.D.1. 5. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? ☒ YES NO

If no, list the locations where open containers are found. _____

9.8.E. 6. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly? YES ☒ NO

9.1.F.2.a. 7. For large quantity generators and
9.1.F.4. TSD facilities only:

6.4.E.1.d. Is an inspection log maintained?

☒ YES NO
when inspections conducted

9.8.F. 8. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? ☒ YES NO

9.8.G.1. 9. Are incompatible wastes placed in separate containers? ☒ YES NO

9.8.G.3. 10. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices? ☒ YES NO

6.4.E.3.a.

11. For satellite accumulation areas:

a. Are there more than 55 gallons of any one type of waste present in the area?

YES NO
N/A

If yes,

6.4.E.3.b

b. Has the amount in excess of 55 gallons been in the satellite accumulation area longer than 3 days?

YES NO
N/A

If yes,

6.4.E.3.b.

6.4.E.1.b.

c. Has the company notified the Department about the location of the accumulation area?

YES NO
N/A

10. Comments:

COMPLIANCE HISTORY

*****CMEL Qual
05

--Header-- -----Evaluation----- ----Violations----

Seq	Date	Seq	Ty	Agy	Who	Date	CL	W	P	R	B	S	A	T	B
-----	------	-----	----	-----	-----	------	----	---	---	---	---	---	---	---	---

VAD09844474

A M P INC

1175 N MAIN ST

Gen = 1 Tra = TSD = Non = SNC =

01	040886	01	1	S		040886	1								0
							2								X
02	071487	01	1	S		071487	1								0 0
							2								0 X
03	112890	01	1	S		112890	1								0 X 0
							2								X 0 X

✓
P. J. Jones

PA SUB REG:

-----Action-----

g Cl Ar Ty Agy Who Taken Sched. Actual Assessed Collected

HARRISONBURG

22801

1 2 OT 03 S 043086 053086 072886

1 2 OT 03 S 072287 072987 072987

1 1 OT 03 S 020891 031591

1 2 MA 03 S 020891 031591

1 2 LB 03 S 020891 031591

E: CMCL

Gen



COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT
11th Floor, Monroe Building
101 N. 14th Street
Richmond, VA 23219
(804) 225-2667
TDD (804) 371-8737

FEB 11 1991

John A. Rehm
Plant Manager
AMP, Incorporated
1175 N. Main St.
Harrisonburg, VA 22801

CERTIFIED - RETURN
RECEIPT REQUESTED

E: NOV

RE: EPA ID# VAD098444474
RCRA Inspection

Dear Mr. Rehm:

During a November 28, 1990 visit to your Department of Waste Management, we found your facility in non-compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Such instances are indicated by checkmarks on the enclosed checklists and are noted below:

1. All manifests are not assigned a unique five-digit number by the generator, as required by VHWMR Section 5.3.B.2. Such instances include manifest NJA0367830 dated 4/14/88, which includes the three-digit manifest number 151, and manifest MDC0018970, dated 12/22/88, which has the "number" 151-B. The latter example, using a number-letter mix, was noted more than once. "Digits" are numerals from 0-9. Please begin to assign all manifests unique five-digit numbers, and submit a copy of a manifest indicating so to the Department.
2. All full containers are not marked with the date that accumulation begins, as required by VHWMR Section 6.4.E.1.b. This was noted on two drums outside the filter storage cage and on the drums of Varsol which were obtained from the decommissioned dip tank. Please ensure that all full containers of hazardous waste are marked with the date that accumulation begins.
3. All containers are not marked with the words "hazardous waste as required by VHWMR Section 6.4.E.1.c. This concerns the drums of Varsol which were obtained from the decommissioned dip

tank. Please ensure that all containers of hazardous waste are marked with the words "hazardous waste."

4. The generator has not notified the Executive Director of all hazardous waste accumulation areas as required by VHWMR Section 6.4.E.1.e. Hazardous waste is being accumulated immediately outside the filter storage cage. The Executive Director has been notified of accumulation in the filter storage cage, but no accumulation just outside the area has been made apparent. Please submit a modified notification of accumulation areas to the Department which includes all accumulation areas, or cease the use of the area outside the cage for hazardous waste accumulation.

5. Although there are documents that indicate that hazardous waste management training did occur, the operator has not maintained any of the training records required by VHWMR Section 9.1.G.4 for the initial training. Please develop training documents which include a) job titles for each position at the facility related to hazardous waste management, b) the name of employee(s) filling each job, c) a written job description for each position in (a), d) a written description of the type and amount of both introductory and continuing training that will be given to each person filling a description listed in (a), and e) records that document that the training or job experience required above has been given to, and completed by facility personnel.

6. No annual review is provided for personnel as required by VHWMR Section 9.1.G.3. Please provide annual reviews of the initial training for those personnel involved in hazardous waste management, and maintain records as noted in item 5 and VHWMR Section 9.1.G.4.

7. Adequate aisle space is not maintained in all hazardous waste accumulation areas as required by VHWMR Section 9.2.E. Aisle space had not been maintained in the filter storage cage. Please maintain adequate aisle space, enough to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment during emergencies, in all hazardous waste accumulation areas.

8. The contingency plan does not contain a description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams as required by VHWMR Section 9.3.B.3. Please modify the contingency plan to include these arrangements.

9. The contingency plan does not include the home addresses of the emergency coordinators as required by VHWMR Section 9.3.B.4.

Please modify the contingency plan to include the home addresses of the emergency coordinators.

10. The contingency plan does not provide a brief outline of the capabilities of all emergency equipment noted on the emergency equipment list as required by VHWMR Section 9.3.B.6. Please modify the contingency plan to include brief outlines of the capabilities of the emergency equipment.

11. Copies of the contingency plan have not been sent to all local police and fire departments, hospitals, and Commonwealth and local emergency response teams as required by VHWMR Section 9.3.C. Copies of the most recent revision (7/26/90) were provided to Harrisonburg Rescue Squad, Fire and Police Departments only. Furthermore, the operator has not maintained documentation that the required facilities did indeed receive the copies of the contingency plan. Please modify the contingency plan as requested in items 8-10 and provide modified copies to all local police and fire departments, hospitals, and Commonwealth and local emergency response teams and somehow document that these agencies received the contingency plans. Then provide a copy of the revised contingency plan to the Department for review, along with documentation that the Commonwealth and local authorities received the revised contingency plan.

12. All areas where hazardous wastes are accumulated are not inspected by the operator on a weekly basis as required by VHWMR Section 9.8.E. Only three of the accumulation areas are inspected. The wastewater treatment area, the filter cage, and the area just outside the filter cage have not been subject to the required weekly inspection. Please initiate inspections of these areas as well, and maintain the results on inspection logs.

13. The generator has not accompanied each shipment of land-disposal restricted waste with appropriate notification of the applicable treatment standards to the receiving facility as required by VHWMR Section 15.1.G.1.a and federal land-disposal restriction requirements. Such instances have occurred with a 7/26/89 shipment to ACR and a 9/6/90 shipment to WRC. A May 10, 1990 letter to your facility from Vanguard also indicates that for shipments of 2/8/90 and 10/6/89 to that facility, land-disposal restriction notifications were not provided. And, as discussed below, the misidentification of some of the electroplating and/or wastewater treatment wastes has resulted in inappropriate land disposal restriction notifications being sent for those wastes.

14. As indicated by manifests, the facility's 1989 annual report, inspection logs, inventory logs, and accumulation dates of the wastes on-site at the time of inspection, the operator has

AMP - Inspection Report
Page 4 of 5

stored land-restricted hazardous waste for greater than 90 days without interim status or a permit, in violation of VHWMR Sections IX, X, XI, and 15.5, and federal land disposal restriction requirements. Considering the maximum generation rates of some waste streams in comparison to off-site shipment frequency (as indicated by manifests), it appears that some wastes have been stored for more than 90 days. The facility's 1989 annual report declares that some wastes (formaldehyde, tin-lead filters and some F007) have been stored for more than 90 days. Inspection logs for the accumulation areas where inspections are conducted indicate that wastes in those areas remained for greater than 90 days. The inventory logs indicate gaps of greater than 90 days between container fill dates and shipment dates for gold resin and filters (F007), tin-lead filters (D008), and Varsol and Isopar G (D001). At the time of inspection, there were two 55-gallon drums of F006 with the accumulation start date of August 6, 1990 at the acid/raw material storage room. In the flammable liquid room, there were drums of ethyl alcohol and ethyl acetate (F003) dated May 17, 1990, August 16, 1990 and March 23, 1989, a drum of petroleum naphtha dated February 7, 1990, and a drum of freon (F001) dated July 19, 1990. In the filter storage cage was a drum of tin-lead filters dated August 21, 1990. Inventory logs and the 1989 annual report indicate that some wastes have been stored, but do not specify where at the plant the materials were stored. Such instances include the storage of formaldehyde and petroleum naphtha. Please specify all areas where formaldehyde (U122), and petroleum naphtha (Varsol and/or Isopar G) have been stored.

Also note that some of the waste codes which are being used for your hazardous wastes are inappropriate. By virtue of drag-out from the gold/cyanide bath, wastes generated subsequent to cyanide use are actually, in addition to waste codes already being used, F007 listed wastes. Presently, the wastewater treatment sludge and the floor sweepings (contaminated with spilled wastewater treatment sludge) from the wastewater treatment area are called F006; they should henceforth be called F006/F007. In addition, tin/lead filters from the tin/lead bath, which are presently called D008, should be called D008/F007; the same would also apply to tin/lead baths themselves when the need for disposal arises.

It was noted that your facility sends F006 sludge to World Resources Company (WRC) Processing Company of Pottsdam, Pennsylvania. Such shipments are presently allowable; however, please be reminded of ongoing enforcement action being taken against WRC by the Commonwealth of Pennsylvania Department of Environmental Resources and EPA Region III which could affect the future status of this activity.

AMP - Inspection Report
Page 5 of 5

Due to the occurrence of unauthorized storage of hazardous waste and repeat violations (lack of training records and contingency plan documentation were noted during the VDWM inspection report of May 6, 1986), these matters are being brought to the attention of Department enforcement staff for resolution. Land disposal restriction violations are being brought to the attention of EPA Region III.

Please take the appropriate corrective actions to bring your facility into compliance with the regulations within 30 days of receipt of this letter. Please write the Department describing all corrective actions at that time.

Thank you for your cooperation during the inspection. Enforcement will be contacting you separately. If I can be of any assistance, please feel free to contact me at (804) 225-2525.

Sincerely,



Cheryl Finley
Environmental Engineer Senior
Division of Technical Services

Enclosures

C.R. Smith, VDWM



E: 100 ✓

COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, VA 23219

(804) 225-2667

TDD (804) 371-8737

FEB 11 1991

391

CERTIFIED - RETURN
RECEIPT REQUESTED

John A. Rehm
Plant Manager
AMP, Incorporated
1175 N. Main St.
Harrisonburg, VA 22801

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2 F006
3 F003
1 F001
1 F007

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Sincerely,



Cheryl Finley
Environmental Engineer Senior
Division of Technical Services

Enclosures, 16/11

C.R. Smith, VDWM





COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, Va. 23219

CERTIFIED RETURN

RECEIPT REQUESTED

JUL 23 1987

John Rehm, Plant Manager

AMP, Inc.

1175 North Main Street

Harrisonburg, Virginia 22801

VA D098444474

Dear Mr. Rehm:

During the inspection of your facility on July 14, 1987, by Wade E. Lanford of this Department, it was determined that your facility was not in total compliance with Virginia Hazardous Waste Management Regulation (VHWMR). The one instance of noncompliance noted was your facility did not ascertain that each transporter of hazardous wastes from your facility hold a Virginia transporter permit. This instance of noncompliance is noted by a check mark on the enclosed generator checklist completed during this inspection. Copies of the survey sheet and container checklist also completed during this inspection are also enclosed.

Review of this Department's records subsequent to the inspection indicate that five of the six transporters listed on the manifests inspected by Mr. Lanford hold the Virginia transporter permit as required. However, Vanguard Research, NJD990753493 does not hold a Virginia transporter permit. Please send to this office by July 29, 1987, copies of all manifests of hazardous waste transported from your facility by Vanguard Research. In the future, please pay close attention to the requirement for a Virginia transporter permit when hazardous wastes are transported from your facility.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, reading "William F. Gilley".

William F. Gilley, P.E., Director
Division of Regulation

SURVEY SHEET

4/1/86

Name of Facility: AMP Inc.
 Address: 1175 N. Main St.
Harrisonburg, Va 22801
 EPA Generator ID Number: VAD 098 444474
 Facility Inspection Representative: John Rehm
 Title: Plant Manager
 Telephone Number: (703) 433-3200

1. What is business activity of firm? (i.e., furniture mfg., metal plating, recycling, etc.) manufacture of solderless plated electrical termination

2. Give brief description of waste stream(s) and code designation(s).
Wastewater treatment sludges from electroplating operations (F006), spent cyanide plating bath solutions (F007), waste acids (D002), spent halogenated solvents (F001)

3. List the amounts of hazardous waste generated, recycled and accumulated.

a. Characteristic - Ignitable (D001)
 Corrosive (D002)
 Reactive (D003)
 EP Toxic (D004-D017)

b. Listed (F, K, or U list)

c. Listed (P)

d. Waste from spills of P and U list

	(1) Total Generated #/mo	(2) Total Recycled #/mo	(3) Difference #/mo (1) minus (2)	(4) Total Regulated #/mo (1) or (3)	(5) Total Accumulated
	1760	0	1760	1760	15,000 *
	4,000	0	5,000	5,000	10,000
	100	0	100	100	100

4. Based on the above information, the company is classified as:

a. Small quantity generator exempt from regulations. (Form C)

b. Recycler not exempt from regulations. (Form A)

c. Generator. (Form A)

5. If facility treats, stores or disposes on-site complete Form B (unless exempt under § 9.).

6. Complete the appropriate checklists.

Container (Form I)

Surface Impoundment (Form K)

Landfill (Form N)

Tank (Form J)

Incineration & Thermal

Treatment (Form O & P)

Physical, Chemical & Biological

Treatment (Form Q)

7. Comments:

* Note: 34 drums of copper sulfate solution (ph less than 2) which
were being stored for use in manufacturing were found to
be not suitable for intended use. It was then shipped
offsite in about 70 days

Inspector's Name: W.E. Lanford

Title: Area Manager

Agency: Va. State Health Department, Bureau of Hazardous Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building
Richmond, Virginia 23219

Date of Inspection: 7/14/87

CHECKLIST FOR RCRA INSPECTION OF GENERATORS

Name of Facility: AMP Inc.
Address: 1175 N. Main St.
Harrisonburg, Va. 22801
EPA Generator ID Number: VAD 098 444474
Facility Inspection Representative: John Rehm
Title: Plant Manager
Telephone Number: (703) 433-3200

VA HWM Regs.
Reference:

- 6.3
1. Is a manifest system currently used by the generator so that off-site shipment of hazardous wastes can be tracked? ☒ Yes ☐ No
 2. Is the following included on the generators manifest?
 - 5.3.B.1. a) The generator's name, address, telephone number and EPA ID number. ☒ Yes ☐ No
 - 5.3.B.2. b) A unique five digit number assigned to this manifest by the generator. ☒ Yes ☐ No
 - 5.3.B.3. c) Total number of pages used to complete the manifest. ☒ Yes ☐ No
 - 5.3.B.4. ~~A~~ d) The company name and EPA identification of each transporter. ☒ Yes ☐ No
Clemens Waste Services, Inc. PAD 000414615
 - 5.3.B.5. e) The company name, site address and the EPA ID number of the facility designated to receive the waste listed on the manifest. ☒ Yes ☐ No
 - 5.3.B.6. f) The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number (UN/NA), as identified in the Virginia Regulations Governing the Transportation of Hazardous Materials. ☒ Yes ☐ No

- 5.3.B.7. g) The units of weight or volume and the type and number of containers loaded in the transport vehicle included on the manifest form? ☒ Yes ☐ No
- 5.3.B.8. h) In case of international shipment, the point of departure (city & state) for those shipments destined for treatment, storage, and disposal outside the jurisdiction of the United States. Yes ☒ No
- 5.3.C. i) The following certification noted on the generator's manifest form and is the certification acknowledged by the generator's signature.
- "I hereby declare that the content of this consignment are fully and accurately described above by proper shipping name and are classified packed, marked, and labeled, and condition for transport by [mode of transportation] according to applicable international and national governmental regulations."
- 6.5.C.2. 3. Have manifest been received from TSD for waste shipped over 45 days ago. ☒ Yes ☐ No
- if not,
- has the generator filed an exception report? Yes ☐ No
- 5.5.A.7. ✓ 4. Did the generator determine that the transporter has a Virginia transporter permit? Yes ☒ No
- 6.4.E.1. 5. Is hazardous waste being accumulated on-site by the generator for less than 90 days? If yes, ☒ Yes ☐ No
- 6.4.E.1.a. a) Is the waste placed in either containers or tanks? (If yes, fill out appropriate checklist. If no, TSD permit is required.) ☒ Yes ☐ No
- 6.4.E.1.b. b) Is the date accumulation of waste began clearly and visibly marked on each container and, does it indicate accumulation for less than 90 days? ☒ Yes ☐ No

- 6.4.E.1.c. c) During accumulation, are the storage containers and/or tank clearly labeled with the words Hazardous Waste? ☒ Yes No
- 9.1.G.1. 6. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? ☒ Yes No
- 9.1.G.2. 7. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? ☒ Yes No
- 9.1.G.3. 8. Do personnel participate in an annual review of their initial training? ☒ Yes No
- 9.1.G.4.a. 9. Does the facility maintain a record of:
- (a) job titles for personnel that are involved with hazardous waste management; and ☒ Yes No
- (b) the name of the employee filling each job? ☒ Yes No
- 9.1.G.4.b. 10. Does the facility have on record a written position description for each job title noted in Question #9? ☒ Yes No
- 9.1.G.4.c. 11. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management? ☒ Yes No
- 9.1.G.4.d. 12. Does the facility have records to document this training? ☒ Yes No
- 9.2.B.
9.2.D. 13. At the facility, is the following equipment installed:
- 9.2.B.1. a) An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ Yes No

- 9.2.B.2. b) A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire departments, etc.? ☒ Yes No
- 9.2.B.(3, 4) c) Portable fire extinguishers, fire control, spill control, and decontamination equipment and water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? ☒ Yes No
- 9.2.C. 14. Is a record of tests and inspections of required equipment (question 11) maintained at the facility? ☒ Yes No
- 9.2.F. 15. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? ☒ Yes No
- 9.3.A.1.
6.4.E.1.d. 16. Does the facility have an established contingency plan to deal with any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to the air, soil, groundwater or surface water? ☒ Yes No
- 9.3. 17. Does the contingency plan contain the following elements:
- 9.3.B.(1, 2) a) A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous wastes to air, soil, and water? ☒ Yes No
- 9.3.B.4. b) A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? ☒ Yes No
List primary coordinator.

Name John Rehm

Title Emergency Coordinator

Telephone (703) 433-3200 (at work)
(703) 234-8785 (at home)

- 9.3.B.5. c) A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? ☒ Yes No
- 9.3.B.5. d) Does this list specify the location and physical description of each item on the list and a brief description of each item on the list, and a brief outline of its capabilities. ☒ Yes No
- 9.3.B.6. e) An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? ☒ Yes No
- 9.3.C. f) Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List: ☒ Yes No
- Harrisonburg Police Department
Harrisonburg Fire Department
Rockingham Memorial Hospital
Department of Emergency Services
- 9.3.B. 1) Is there documentation to indicate the personnel listed above received the contingency plan? ☒ Yes No
- 9.3.F.(9, 10) g) If the contingency plan has been implemented, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed? Not applicable Yes No
- 6.5.A. 18. Does the facility retain copies of all manifests, annual reports, and test results for at least three years? ☒ Yes No
- 6.5.B. 19. Has the facility submitted an annual report for the preceding calendar year? ☒ Yes No

20. Comments

Waste acids are used by AMP waste
treatment facilities which in turn discharge
to a POTW.

Inspector's Name: W.E. Lanford

Title: Area Manager

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building
Richmond, Virginia 23219

Date of Inspection: 7/14/87

Inspector's Name: _____

Title: _____

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building
Richmond, Virginia 23219

Date of Inspection: _____

*Note: In addition to Clements Waste Services, Inc., the following transporters were noted
on AMP, Inc. manifests:

(1) IT Corporation CAD 000057760

(2) Oil Service Co. TMD 098558019

(3) Vanguard Resource MJD 990715013

(4) Resource Technology Services, Inc. PAD 980550479

(5) Delvecchio Disposal PAD 980830061

(6) John P. Francis PAD 002791072

CHECKLIST FOR RCRA INSPECTION OF USE
AND MANAGEMENT OF CONTAINERS

Name of Facility: A-100 Inc
Address: 1175 N. Main St.
Harrisonburg, Va. 22801
EPA Generator ID Number: VAD 098444774
Facility Inspection Representative: John Rehm
Title: Plant Manager
Telephone Number: (703) 433-3200

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities and generators accumulating less than 90 days (see § 6.4.E.1.a. that store containers of hazardous waste, except as § 9. provides otherwise.

VA HWM Regs.
Reference

- | | | | |
|------------------------|---|--------------------------------------|----|
| 9.8.B. | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? | <input checked="" type="radio"/> Yes | No |
| 9.8.C. | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? | <input checked="" type="radio"/> Yes | No |
| 9.8.D.1. | 3. Are all containers holding hazardous waste kept closed during storage? | <input checked="" type="radio"/> Yes | No |
| 9.8.E. | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week? | <input checked="" type="radio"/> Yes | No |
| 9.1.F.2.a.
9.1.F.4. | 5. Is an inspection log maintained? (See question #7 of TSD checklist.) | <input checked="" type="radio"/> Yes | No |
| 9.8.F. | 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? | <input checked="" type="radio"/> Yes | No |
| 9.8.G.1. | 7. Are incompatible wastes placed in separate containers? (See APPENDIX 9.4 for examples of incompatible waste). | <input checked="" type="radio"/> Yes | No |

9.8.G.3.

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices?

(Yes) No

9. Comments:

Inspector's Name: W. E. Lanford

Title: Area Manager

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building
Richmond, Virginia 23219

Date of Inspection: 7/14/87

Inspector's Name: _____

Title: _____

Agency: Department of Waste Management

Office Location: 101 N. Fourteenth St., 11th Floor Monroe Building
Richmond, Virginia 23219

Date of Inspection: _____

Bob
Greener

Camp

FROM FAX NO (717) 558 - 5801

PAGES TO GO LOW (Excluding this cover sheet)

F:3008(a)

COMPANY 2.

GROUP/DIV. or DEPT Environmental Programs DATE 11/18

COMMENTS

PHONE (717) 558-5919

DOES SENDER WANT COPIES RETURNED?

☐ YES☐ NO

Harrisburg, PA 17105-3608
Phone: 717-564-0100
TWX: 510-657-4110

J. E. Gurski
Corporate Vice President
Capital Goods Business Sector
Mail Stop 176-040
Direct Dial: 717-780-6060
Fax: 717-780-7555

AMP

AMP Incorporated

November 15, 1991

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Bruce P. Smith, Associate Director
Office of RCRA Programs
Hazardous Waste Management Division
US Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

Re: In re: AMP Incorporated
Docket No. RCRA-III-232

Dear Mr. Smith:

This letter is sent pursuant to a Compliance Order issued to AMP Incorporated ("AMP") dated September 30, 1991.

Pursuant to paragraph 7 of the Compliance Order, AMP hereby submits the following report and certification:

1. Compliance with Paragraphs 1, 2, 3, and 6 of the Compliance Order¹.

AMP has complied with paragraph 1 of the Compliance Order. Samples of the tin/lead filters and the waste tin/lead bath were collected on or before October 17, 1991, and delivered to Lancaster Laboratories on October 18, 1991. These waste samples were determined to be the relevant wastes pursuant to discussions with EPA, as indicated in Exhibit A.

AMP has complied with paragraphs 2 and 3 of the Compliance Order. Appropriate correspondence/notifications were mailed on October 18, 1991.

AMP has complied with paragraph 6 of the Compliance Order. A letter was sent to you by facsimile on November 1, 1991, attached hereto as Exhibit B.

¹ AMP is contesting that portion of the Complaint, Compliance Order, and Notice of Opportunity for a Hearing ("Complaint") related to Counts I and II of the Complaint. Those Counts involve the contention by EPA that the tin/lead filters used in AMP's plating process are both D008 and F007 wastes. Nevertheless, AMP is complying with the Compliance Order in its entirety, but does so without admitting any fact or allegation in the Complaint.

Bruce P. Smith, Associate Director
November 15, 1991
Page 2 of 2

Additionally, AMP has taken several steps to address the alleged violations described in the Complaint, and to prevent any future problems. A number of those steps are described in Exhibit B. Further, AMP personnel from the Environmental Programs Department ("EPD") personally visited the Harrisonburg facility twice in recent weeks, once to conduct environmental awareness training for plant management, and again to perform a comprehensive environmental compliance assessment. Moreover, AMP corporate personnel have been fully briefed on the issues raised in the Complaint, and there will be close scrutiny of environmental matters at the Harrisonburg, Virginia, plant in the months ahead. For instance, an extensive follow-up assessment will be conducted by AMP EPD personnel in November, 1991.

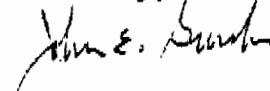
Additionally, AMP is focusing efforts on waste minimization/ waste elimination at the Harrisonburg, Virginia, plant. Two technical experts from AMP, Ron Vidra and Dennis Lehman, will visit the plant in November, 1991, to expedite waste minimization activities for the facility, and pollution prevention processes used at other AMP plating plants, such as alkaline cleaner recycling, back-flushable filters, and electrolytic metal recovery, will be evaluated for use at the Harrisonburg, Virginia plant.

2. Certification Pursuant to 40 CFR §270.11(d)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions or comments, please feel free to contact me.

Sincerely,



J. E. Gurski
Corporate Vice President
Capital Goods Business Sector

DFB/jr

cc: D. Brennan, C. Jamieson (EPA-Office of Regional Counsel-3RC31),
B. Klingler, D. Kortze, S. Leiphart, L. Miller, C. Ritter
R. Smith, M. Texter, B. Wescott, P. Workinger, Date File, File

AMP

AMP Incorporated

BY FACSIMILE

October 16, 1991

Cheryl Jamieson, Esq. (3RC31)
Office of Regional Counsel
US Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

Re: AMP Inc. (Harrisonburg)
Docket No. RCRA-III-232

Dear Cheryl:

This follows my conversation today with Cecil Rodriguez and Sheila Briggs regarding the recent Compliance Order. The purpose of the conversation was for AMP Inc. to clarify the requirements in paragraphs 1-3 of the Compliance Order.

With respect to paragraph 1 of the Compliance Order, AMP Inc. will perform the waste analyses required under 40 CFR § 268.7(a) for the tin/lead bath and the tin/lead filters, since those are the wastes relevant to the D008/F007 issue.


Under paragraph 2 of the Compliance Order, AMP Inc. will provide land ban forms indicating F007 and D008 waste codes/treatment standards for shipments listed in paragraphs 20 and 30 (not 29). The appropriate reference for the treatment standard for F007, which theoretically could be either Table CCWE of 40 CFR § 268.41 or Table CCW of 40 CFR § 268.43, or both, will be (per Douglas Donor) "(1) 40 CFR § 268.41, Table CCWE, for metals, and (2) 40 CFR § 268.43, Table CCW, for cyanides." These references will be used by AMP Inc. in its forms/correspondence used to meet the Compliance Order's requirement to specify the treatment standard for the tin/lead filters now designated as F007.

With respect to paragraph 3 of the Compliance Order, AMP Inc. will provide a blanket notification to TSDs who received the wastes regarding the required F007 designation/treatment standards for all tin/lead filters (the tin/lead bath was treated on site prior to September 1991) sent for disposal between July 8, 1989, and July 8, 1990.

If the above does not fairly summarize the conversation, or if you have any questions or comments, please contact me.

Nothing herein should be considered as an admission by AMP Inc. regarding the Compliance Order. AMP Inc. still contests the findings in the Order regarding, inter alia, the F007 designation, but wishes to comply with the Order pending resolution of that issue.

Sincerely,


Douglas F. Brennan
Environmental Counsel

cc: Cecil Rodriguez, Esq.

Harrisburg, PA 17105-3608
Phone 717-558-5801
TWX 312657-1111

EXHIBIT D P.5

Bensen Klingler
Director, Environmental Programs
Mail Stop 081-001
Direct Dial: 717-558-5805
Fax: 717-558-5801

AMP

AMP Incorporated

November 1, 1991

Bruce P. Smith, Associate Director
Office of RCRA Programs
Hazardous Waste Management Division
US Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

Re: AMP Incorporated
Harrisonburg, Virginia, Plant

Dear Mr. Smith:

This letter is sent pursuant to a Compliance Order issued to AMP Incorporated dated September 30, 1991.

Pursuant to paragraph 6 of the Compliance Order, AMP hereby notifies EPA that AMP does not intend to submit an application for a permit to store hazardous waste at its Harrisonburg, Virginia, plant.

AMP intends to take the following measures to comply with the Virginia regulations governing storage of hazardous waste:

- a. AMP has made several personnel changes since learning of these violations following the inspection by the Virginia Department of Waste Management ("VDWM") in November 1990. First, the plant manager has been relieved of his duties and a new one brought in to take his place. Additionally, an environmental coordinator has been assigned to fill a position which was vacant for a period of time. These personnel are very much aware of the importance of compliance with the environmental requirements.
- b. The new environmental coordinator, along with plant management and with the support of division management and the Environmental Programs Department in Harrisburg, have already implemented and are developing new plant procedures regarding storage and handling of hazardous wastes at the plant. These new procedures include controlled access to hazardous waste storage areas, improved accumulation procedures and other matters.
- c. Existing procedures in AMP's Environmental Specifications will be closely followed. These include weekly inspections of storage areas, completion of waste inventory logs, communication procedures between the AMP Environmental Programs Department ("EPD") and the plant regarding waste inventory and new waste streams, and procedures for labeling and accumulating hazardous wastes.

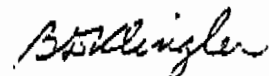
Bruce P. Smith, Associate Director
November 1, 1991
Page 2 of 2

- d. Staff in EPD will closely monitor the waste inventory at the Harrisonburg plant. Additionally, EPD is investigating consolidation of disposal vendors to facilitate timely removal of the wastes from the plant.
- e. AMP is developing a company-wide computer tracking/inventory system to monitor accumulation of wastes at all of its plants. This system is scheduled to be operational by January/February 1992. This system will greatly enhance AMP's tracking of waste accumulation at Harrisonburg and elsewhere.

Although AMP is contesting the F007 issue in Counts I and II of the Complaint and Compliance Order, AMP is complying with paragraphs 1-3 of the Compliance Order, and will designate the tin/lead filters as F007 prospectively, pending resolution of that issue. Nothing herein shall be construed as an admission by AMP of any allegation in the Complaint and Compliance Order.

If you have any questions or comments, please feel free to contact me.

Sincerely,



Bensen Klingler
Director
Environmental Programs Department

cc: D. Brennan
J. Gurski
C. Jamieson (EPA-Office of Regional Counsel-3RC31)
D. Kortze
S. Leiphart
L. Miller
C. Ritter
R. Smith
B. Wescott
P. Workinger

P.O. Box 3608
Harrisburg, PA 17105-3608
Phone: 717-564-0100
TWX: 510-657-4110

*Bob
Gurski*

J. E. Gurski
Corporate Vice President
Capital Goods Business Sector
Mail Stop 176-040
Direct Dial: 717-780-6060
Fax: 717-780-7555

AMP

AMP Incorporated

November 15, 1991

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

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Office of RCRA Programs
Hazardous Waste Management Division
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841 Chestnut Building
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Docket No. RCRA-III-232

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Bruce P. Smith, Associate Director
November 15, 1991
Page 2 of 2

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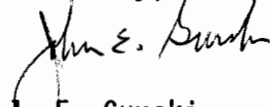
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If you have any questions or comments, please feel free to contact me.

Sincerely,



J. E. Gurski
Corporate Vice President
Capital Goods Business Sector

DFB/jr

cc: D. Brennan, C. Jamieson (EPA-Office of Regional Counsel-3RC31),
B. Klingler, D. Kortze, S. Leiphart, L. Miller, C. Ritter
R. Smith, M. Texter, B. Wescott, P. Workinger, Date File, File

P.O. Box 3608
Harrisburg, PA 17105-3608
Phone: 717-564-0100
TWX: 510-657-4110

Exhibit A
Douglas F. Brennan
Environmental Counsel
Mail Stop 081-001
Direct Dial: 717-558-5863
Fax: 717-558-5801

AMP

AMP Incorporated

BY FACSIMILE

October 16, 1991

Cheryl Jamieson, Esq. (3RC31)
Office of Regional Counsel
US Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

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Docket No. RCRA-III-232

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With respect to paragraph 1 of the Compliance Order, AMP Inc. will perform the waste analyses required under 40 CFR § 268.7(a) for the tin/lead bath and the tin/lead filters, since those are the wastes relevant to the D008/F007 issue.

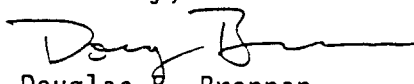
Under paragraph 2 of the Compliance Order, AMP Inc. will provide land ban forms indicating F007 and D008 waste codes/treatment standards for shipments listed in paragraphs 20 and 30 (not 29). The appropriate reference for the treatment standard for F007, which theoretically could be either Table CCWE of 40 CFR § 268.41 or Table CCW of 40 CFR § 268.43, or both, will be (per Douglas Donor) "(1) 40 CFR § 268.41, Table CCWE, for metals, and (2) 40 CFR § 268.43, Table CCW, for cyanides." These references will be used by AMP Inc. in its forms/correspondence used to meet the Compliance Order's requirement to specify the treatment standard for the tin/lead filters now designated as F007.

With respect to paragraph 3 of the Compliance Order, AMP Inc. will provide a blanket notification to TSDs who received the wastes regarding the required F007 designation/treatment standards for all tin/lead filters (the tin/lead bath was treated on site prior to September 1991) sent for disposal between July 8, 1989, and July 8, 1990.

If the above does not fairly summarize the conversation, or if you have any questions or comments, please contact me.

Nothing herein should be considered as an admission by AMP Inc. regarding the Compliance Order. AMP Inc. still contests the findings in the Order regarding, inter alia, the F007 designation, but wishes to comply with the Order pending resolution of that issue.

Sincerely,



Douglas P. Brennan
Environmental Counsel

cc: Cecil Rodriguez, Esq.

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Bensen Klingler
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AMP

AMP Incorporated

November 1, 1991

Bruce P. Smith, Associate Director
Office of RCRA Programs
Hazardous Waste Management Division
US Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

Re: AMP Incorporated
Harrisonburg, Virginia, Plant

Dear Mr. Smith:

This letter is sent pursuant to a Compliance Order issued to AMP Incorporated dated September 30, 1991.

Pursuant to paragraph 6 of the Compliance Order, AMP hereby notifies EPA that AMP does not intend to submit an application for a permit to store hazardous waste at its Harrisonburg, Virginia, plant.

AMP intends to take the following measures to comply with the Virginia regulations governing storage of hazardous waste:

- a. AMP has made several personnel changes since learning of these violations following the inspection by the Virginia Department of Waste Management ("VDWM") in November 1990. First, the plant manager has been relieved of his duties and a new one brought in to take his place. Additionally, an environmental coordinator has been assigned to fill a position which was vacant for a period of time. These personnel are very much aware of the importance of compliance with the environmental requirements.
- b. The new environmental coordinator, along with plant management and with the support of division management and the Environmental Programs Department in Harrisburg, have already implemented and are developing new plant procedures regarding storage and handling of hazardous wastes at the plant. These new procedures include controlled access to hazardous waste storage areas, improved accumulation procedures and other matters.
- c. Existing procedures in AMP's Environmental Specifications will be closely followed. These include weekly inspections of storage areas, completion of waste inventory logs, communication procedures between the AMP Environmental Programs Department ("EPD") and the plant regarding waste inventory and new waste streams, and procedures for labeling and accumulating hazardous wastes.

Bruce P. Smith, Associate Director
November 1, 1991
Page 2 of 2

- d. Staff in EPD will closely monitor the waste inventory at the Harrisonburg plant. Additionally, EPD is investigating consolidation of disposal vendors to facilitate timely removal of the wastes from the plant.
- e. AMP is developing a company-wide computer tracking/inventory system to monitor accumulation of wastes at all of its plants. This system is scheduled to be operational by January/February 1992. This system will greatly enhance AMP's tracking of waste accumulation at Harrisonburg and elsewhere.

Although AMP is contesting the F007 issue in Counts I and II of the Complaint and Compliance Order, AMP is complying with paragraphs 1-3 of the Compliance Order, and will designate the tin/lead filters as F007 prospectively, pending resolution of that issue. Nothing herein shall be construed as an admission by AMP of any allegation in the Complaint and Compliance Order.

If you have any questions or comments, please feel free to contact me.

Sincerely,



Bensen Klingler
Director
Environmental Programs Department

cc: D. Brennan D78
J. Gurski
C. Jamieson (EPA-Office of Regional Counsel-3RC31)
D. Kortze
S. Leiphart
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C. Ritter
R. Smith
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